

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF OHIO
3 WESTERN DIVISION

4 * * *

5 J.B.D.L. CORP. d/b/a : CIVIL ACTION
6 BECKETT APOTHECARY, et al. :

7 :
8 vs. :

9 WYETH-AYERST LABORATORIES, :
10 INC., et al. : NO. C-1-01-704

11 * * *

12 MARCH 5, 2004

13 * * *

14 Videotape deposition of RAYMOND W.
15 TIEDEMANN, taken pursuant to notice, was held at the
16 law offices of BERGER & MONTAGUE, P.C., 1622 Locust
17 Street, Philadelphia, Pennsylvania 19103, beginning
18 at 9:27 a.m., before McKinley Wise, a Registered
19 Professional Reporter and an approved Reporter of
20 the United States District Court.

21 * * *

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23 A L S O P R E S E N T :

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24 ED CASWELL, IV, Videographer

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1 MR. TAUS: Which exhibit is that?

2 18?

3 MR. EGGERT: Tiedemann 18. It's a
4 document that has a number of persons on
5 distribution on the first page and then
6 follows with a memorandum from Susan Holden
7 to distribution dated July 12th, 2001.

8 BY MR. EGGERT:

9 Q. If I can direct you to the page
10 which is marked 180722. In the third column,
11 there is a price increase history for the year
12 2000. Do you -- do you see that?

13 A. Yes, I do.

14 Q. And if you were to look at the price
15 increase percentages in the year 2000 for
16 Premarin's .625-milligram tablet and Cenestin's
17 .625-milligram tablet, which was higher?

18 A. The Cenestin price increase in the
19 year 2000, according to this document, was 17.4
20 percent versus Premarin's at 12.8 percent
21 increase.

22 Q. So whatever the magnitude of
23 Premarin's price increase, that of Cenestin was
24 even higher then?

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1 A. In this particular year, it was,
2 yes.

3 Q. I think counsel asked you a number
4 of questions concerning reactions to Wyeth's price
5 increases from a variety of sources, Congress,
6 newspapers, the consuming public.

7 Did you ever -- did you ever hear of
8 any complaints from Wyeth's largest customers, its
9 wholesalers, concerning its price increases?

10 A. No. To the best of my knowledge,
11 not only did we never receive any complaints, we
12 were under the impression that the wholesalers
13 were very happy with the price increases because
14 their inventory automatically appreciated by the
15 amount that we took our price increase and that
16 was profit for the wholesalers.

17 MR. EGGERT: I have no further
18 questions.

19 MR. TAUS: Potentially only one
20 question.

21 BY MR. TAUS:

22 Q. Did you discuss your testimony --
23 the questions and answers to -- to the questions
24 that Mr. Eggert just gave you prior to Mr. Eggert